

Hearing Date: June 15, 2011 at 10:00 a.m. (Prevailing Eastern Time)
Response to Deadline: June 8, 2011 at 4:00 p.m. (Prevailing Eastern Time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: :
:
LEHMAN BROTHERS HOLDINGS, INC., *et al.*, : Chapter 11
:
Debtors. : Case No.: 08-13555(JMP)
:
(Jointly Administered)

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**NOTICE OF MOTION OF MONTI FAMILY HOLDING COMPANY, LTD FOR LEAVE
TO CONDUCT RULE 2004 DISCOVERY OF DEBTOR LEHMAN BROTHERS
HOLDINGS INC AND OTHER ENTITIES**

PLEASE TAKE NOTICE that Monti Family Holding Company, Ltd (“MFHC”), by and through its counsel, Certilman Balin Adler & Hyman, LLP, have filed a Motion Seeking Leave to Conduct Rule-2004 Discovery of the Debtor, Lehman Brothers Holdings, Inc. and Other Entities (the “Motion”).

PLEASE TAKE FURTHER NOTICE, that a hearing (the “Hearing”) to consider the relief requested in the Motion has been scheduled for 10:00 a.m. (Eastern Time) on June 15, 2011, before the Honorable James M. Peck, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 601, New York, New York 10004-1408.

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must (a) be made in writing; (b) comply with the Bankruptcy Code, the Bankruptcy Rules, the local Rules for the United States Bankruptcy Court for the Southern District of New York and the Order pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [docket. 285]; (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) (i) electronically by registered users of the Bankruptcy Court's case filing system, or (ii) on a 3.5 inch disk(preferably in Portable Document Format(PDF), WordPerfect, or any other Windows-based word processing format) used by all parties in interest; (d) be submitted in hard copy form to the chambers of the Honorable James M. Peck, United States Bankruptcy Judge, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004; and (e) be served upon the following parties: (i) Richard J. McCord, Esq., Certilman Balin Adler & Hyman, LLP, counsel for Monti Family Holding Company, Ltd, 90 Merrick Avenue, East Meadow, New York 11554; (ii) counsel for the Debtors, Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York, 10153, Attn: Richard W. Slack, Esq., Michael J. Firestone, Esq., Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq., and Jacqueline Marcus, Esq.; (iii) counsel for the Official Committee of Unsecured Creditors, Milbank, Tweed, Hadley & McCloy, LLP, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq.; and (iv) Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Riffkin, Esq., and Tracy Hope Davis, Esq., in

each case so as to **be received not later than 4:00 p.m. (Eastern Time) on June 8, 2011 (the “Response Deadline”)**.

PLEASE TAKE FURTHER NOTICE that only responses made in writing and timely filed and received by the Response Deadline will be considered by the Bankruptcy Court at the Hearing. If no responses to the Motion are timely filed and served in accordance with the procedures set forth herein, the Bankruptcy Court may enter an order granting the Motion without further notice.

Dated: East Meadow, New York
May 12, 2011

CERTILMAN BALIN ADLER & HYMAN, LLP

By: /s/ Richard J. McCord
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